

Message

From: Davis, Cassandra M (DEC) [Cassandra.Davis@dec.ny.gov]
Sent: 9/24/2020 4:58:52 PM
To: Sweeney, Jeff [sweeney.jeff@epa.gov]
Subject: RE: Facility Nutrient Trading

Hi Jeff,

The question I had is if N:P exchange within a wastewater facility was allowed and how the ratio would be determined. We have a facility in the watershed looking to grow and they will need to offset their growth. They were proposing to exceed their TP waste load allocation and use the "extra TP" towards their TN waste load allocation, using the language in WIP II.

Based on your previous answer it seems that exchanging N:P at the wastewater facility scale is not allowed, is that correct?

Thanks,
Cassie

From: Sweeney, Jeff <sweeney.jeff@epa.gov>
Sent: Thursday, September 24, 2020 12:43 PM
To: Davis, Cassandra M (DEC) <Cassandra.Davis@dec.ny.gov>
Subject: Facility Nutrient Trading

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Cassie,

It seems to me that removing the "exchange ratios within a wastewater facility in WIP III and from their updated permits" was the right thing to do as they're no longer applicable. But I'm not sure what your question is now.

Jeff Sweeney
Cell: 410-533-6617

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From: Davis, Cassandra M (DEC) <Cassandra.Davis@dec.ny.gov>
Sent: Thursday, September 24, 2020 11:51 AM
To: Sweeney, Jeff <sweeney.jeff@epa.gov>
Subject: RE: Facility Nutrient Trading

Hi Jeff,

That's correct, I used the wrong term. Sorry for the confusion and thanks for the clarification, I did mean wastewater treatment facility. The question came from language that was in our WIP II that we removed during WIP III.

In WIP II we had a wastewater offset calculation and implementation section, facilities were able to exchange phosphorus for nitrogen based on an exchange ratio and delivery factor in WIP II and in their permits. This was to offset future growth and was never used. Lauren and I removed the exchange ratios within a wastewater facility in WIP III and from their updated permits.

Thanks,
Cassie

From: Sweeney, Jeff <sweeney.jeff@epa.gov>
Sent: Thursday, September 24, 2020 11:30 AM
To: Davis, Cassandra M (DEC) <Cassandra.Davis@dec.ny.gov>
Subject: Facility Nutrient Trading

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Cassie,

I don't think you mean a nutrient trading program, correct? You mean the exchanges between N and P that are applied to draft WIPs when one nutrient goes beyond (better than) the target. Correct? Also, would you be clearer about "facility"? Do you mean wastewater treatment facility? If so, N: P exchanges are solely for exchanges at the scale of state-basins. In NY's case, that's the NY Susquehanna as a whole for all sources combined, not for particular sources or particular waste treatment facilities.

Jeff Sweeney
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From: Davis, Cassandra M (DEC) <Cassandra.Davis@dec.ny.gov>
Sent: Thursday, September 24, 2020 9:37 AM
To: Sweeney, Jeff <sweeney.jeff@epa.gov>
Subject: Facility Nutrient Trading

Hi Jeff,

I have a quick question. I tried looking in the TMDL and on the Chesapeake Bay Program website and couldn't find anything about trading nitrogen and phosphorus within a specific facility. Would we use the same Susquehanna ratio (2.36) to make it work?

Thanks,
Cassie

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